# **Privacy Policy**

Altecnic Limited ('Altecnic') is committed to protecting and respecting your informational privacy.

This Privacy Policy explains how, when and why Altecnic uses your information and explains your rights in relation to that information. Your information is described and referred to in this Privacy Policy as 'your information' or 'personal data'.

This Privacy Policy also explains how others, including other organisations within the Altecnic Group of companies, may or will use your personal data.

This is the Privacy Policy for:

- Our website <u>www.altecnic.co.uk;</u>
- Customers, or prospective customers of our products and services;
- Account holders, or prospective account holders;
- Our Suppliers;
- End users.

By accessing and using our website; the Altecnic Academy training platform; opening and operating an account with Altecnic; ordering our products and services; completing an online contact form or dealing with Altecnic as a supplier, you agree to the collection, use, storage and transfer of your information under the terms of this Privacy Policy, including Altecnic's terms and conditions of business https://www.altecnic.co.uk/terms-conditions-of-sale/ and https://www.altecnic.co.uk/terms-and-conditions-of-purchase/, the Data Protection Act 2018 and the UK General Data Protection Regulation ('UK GDPR').

## Identity of data controller

Altecnic Limited, Mustang Drive, Stafford, ST16 1GW is registered with the Information Commissioner's Office (the 'ICO') as a data controller with registration reference ZA271252

The ICO is the United Kingdom's independent regulatory authority in relation to data protection and information rights. The ICO provides a helpline and complaints service and can be contacted at:

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or at <u>www.ico.org.uk</u> or by telephone on 0303 1231113.

## Your responsibilities

Although it is our responsibility to ensure compliance with data protection laws we also ask you to act responsibly with your own personal data; so please:

• Make sure you read this Privacy Policy and make sure you understand its contents. If you have any questions about it please contact us at dataprotection@altecnic.co.uk;

- If you open, hold or use a customer account with us then you are responsible for using and accessing your account in a secure environment and for making sure your username and password are also kept securely;
- If you believe your informational privacy has been breached by using our website or your online customer account, please contact us immediately;
- We use appropriate security measures to protect your informational privacy, but unfortunately, any form of data transmission which is based on using the Internet can never be guaranteed as completely secure. We cannot accept liability or responsibility for any unauthorised access to or loss of your personal data that is beyond the scope of the appropriate security measures that we have put in place.

## Visitors to our website

#### What information do we collect about you?

We will collect information about you when you access or visit our website (including when you complete the online contact or newsletter sign up form); when you search our website for products and services, or request further information from us.

The type of information we may collect from you when you access, visit or search or website, may include your name, postal address, job title, e-mail address and telephone number (if you complete the online contact or newsletter sign up form); as well as information about your computer via analytics software such as Google Analytics or other similar technologies. The information we collect includes details of your visits to the website, traffic data, location data, your IP address, operating system and browser type.

When you enter a competition or promotional feature, we may also ask for your name, postal address, social media handles, e-mail address and telephone number so we can administer the competition and notify winners.

Separate terms and conditions may apply if you decide to participate in a competition so please make sure that you read these at the time of entry. These will be published alongside the competition promotional material which may appear on our official social media pages, on our website, or both.

If you contact Altecnic, the Company may keep a record of any communication dependant on the nature and purpose of the communication.

#### How do we use the information we collect about you?

- To contact you for your views on our services;
- If you agree, to keep you informed about our products and services that we offer and about news and promotions;
- To manage, maintain and improve our website.

#### How long do we hold your personal information?

We only retain your information for up to 26 months in order to respond to your query, provide you with the information you require or to send you updates on our products and services for as long as you indicate that you are happy for us to do so.

## Customers/Account Holders

#### What information do we collect about you?

We will collect information about if you apply for, open and/or operate a customer account with us; if you place an order and/or purchase our products or services; if you make a warranty claim; if you make a complaint or if you use our support and administrative services or ask for further information from us.

The type of information we may collect from you is:

- Your name
- Job Title
- Contact Details including email address and telephone/fax numbers
- Credit References
- Payment History
- Credit Limits
- VAT and Company registration numbers
- Trade References

If you contact Altecnic, the Company may keep a record of any communication between us dependant on the nature and purpose of the communication you make. This includes general enquiries, purchase orders, warranty claims, legal documentation and any other data that will require further action from Altecnic.

Separate terms and conditions may apply when you open a customer account so please make sure that you read these at the relevant time.

#### How do we use the information we collect about you?

- To process your order;
- To manage your account (if applicable);
- To contact you for your views on our services and respond to your enquiries and complaints;
- To notify you about important changes or developments;
- If you agree, to keep you informed about our products and services that we offer and about news and promotions;
- Account Management, including payment and debt management;
- Manage orders, deliveries, returns and refunds, including order confirmations;
- For claims management and insurance purposes;
- For record keeping purposes.

#### How long do we hold your personal information?

We retain customer data for as long as it is necessary to fulfil the purposes it was collected for, as required to satisfy any legal, accounting, regulatory or reporting obligations, or as necessary to resolve disputes.

## Suppliers

#### What information do we collect about you?

We will collect information about you when we send a Request for Information (RFI), Request for Quotation (RFQ), or setup a purchase ledger account; the details of which are documented in the associated forms.

If you contact Altecnic, the Company may keep a record of that correspondence dependant on the intent of use of such correspondence. This includes warranty claims, legal documentation and any other data that will require further action from Altecnic.

The type of information we may collect from you is:

- Your name
- Job Title
- Contact Details including email address and telephone/fax numbers
- VAT and Company registration numbers

#### How do we use the information we collect about you?

- To manage a RFI or RFQ;
- To notify you about important changes or developments;
- Account Management, including payment and debt management;
- Manage orders, deliveries, returns and refunds, including order confirmations;
- For claims management and insurance purposes;
- For record keeping purposes.

#### How long do we hold supplier information?

We retain supplier data for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

## End Users

#### What information do we collect about you?

We will collect information about from you in order to fulfil our service or customer service in accordance with article 6(1) point b of the GDPR as outlined in the following section 'Basis of our lawful processing'.

#### How do we use the information we collect about you?

• To handle your service or customer service request.

#### How long do we hold end user information?

We retain supplier data for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

# Basis of our lawful processing

The obligations imposed on us by data protection law means that we can only use your personal data if we have a lawful reason to do so. We have the following lawful reasons for using your personal data;

#### Our contract with you

We use your personal data because it is necessary for the purposes of (i) the formation, performance or termination of our agreement with you in relation to the sale, supply and support services (including warranty claims) of our products and services in accordance with our terms and conditions of business or, (ii) because we have asked you or you have asked us to take specific steps before entering into such an agreement.

In summary, processing your personal data is contractually necessary for:

- The sale and supply of our products and services to you;
- Managing your orders, deliveries, returns and refunds;
- Account Management, including providing and administering your customer account;
- Administrative tasks relating to our contract with you, including providing customer service messages and notifications relating to processing payments, managing claims, paying claims.

#### Our legal obligations

Processing your personal data is necessary to fulfil a legal obligation that we are required to comply with such as adhering to the requirements imposed by UK legislation including Income Tax Acts, VAT Acts, Companies Acts; the regulatory requirements imposed by HMRC and the ICO; anti-money laundering measures; the prevention and detection of fraud; responding to a request from the English courts or the police; defending legal rights; our insurance obligations and ICO record keeping obligations.

#### Your consent

Where you have given us your express consent for us to process your personal data for any of the following purposes:

- Sending you notifications, text messages and emails about our products and services, events and promotions;
- BUT we will not share your data with any third parties for marketing purposes, unless you consent.

You can withdraw your consent at any time by clicking on the 'Unsubscribe' link in our notifications, messages or emails or calling Customer Services on +44 (0) 1785 218200

Please also see the section below 'Keeping You Informed'.

#### Our legitimate interests

Where processing your personal data is necessary for our own legitimate interests or the legitimate interests of a third party, provided that those interests are not outweighed by your individual rights and interests.

Our legitimate interests are:

- Delivering, developing, and improving our products and services;
- Our direct marketing activities, including determining whether our marketing activities are effective;
- Recording and monitoring telephone calls for training purposes and to improve the quality of our services;
- Improving customer facing services, including managing complaints, solving issues via live chat support, messages, notifications, telephone, or email and asking you for a review of our products or services;
- Producing management information;
- Preventing crime and detecting fraud;

#### Processing Special Category Data and Children's Privacy

Where we collect, process and store any of your special category data, we only do so with your explicit consent or were it is necessary for the establishment, exercise or defence of legal claims either when we are faced with any legal claims made against us or where we pursue legal claims ourselves. Our products and services are not directed at, nor do we knowingly collect data from, young persons under the age of 16.

## Where is the data stored?

All data collected by Altecnic is stored within the European Economic Area (EEA). In some instances, we may choose to engage other companies to store or process your personal data on our behalf. In every case, where we chose to do that, we will ensure that any company that we engage is subject to the same standards of data security and provides you with the same level of personal data protection as we are.

This means that where we may transfer or store your information outside the UK or EEA (European Economic Area), we will take steps to ensure that your privacy rights continue to be protected as outlined in this Privacy Notice.

## Keeping you informed

If you have bought or enquired about our products or services previously, we may also use the information we collect to let you know about our other products and services which may be of interest to you and to keep you updated with information about promotional offers. If you agree, we would also like to send you information for other marketing purposes. This may include information about Altecnic, products, services, events or promotions. If the email address you have provided to us is a corporate email address, we may contact you at any time to let you know about our products and services.

However, you will be able to let us know if you no longer want to receive material from us each time that you receive a communication by following the link to unsubscribe.

## Disclosing your data

We never make your personal details available to third party companies for marketing purposes, nor do Altecnic rent or trade email lists with other organisations or businesses.

However, we may use other companies to provide services to you on our behalf. These services may include but are not limited to answering your questions about products or services, sending postal mail and e-mails, analysing data and to obtain professional advice, logistics providers, or service providers for the purpose of organising, carrying out and after-sales services. We will only provide those companies with the information they need to deliver the service we have engaged them for and they are prohibited from using that information for any other purpose.

You can unsubscribe to marketing mailings at any time by clicking the unsubscribe link within any of our emails or by emailing marketing@altecnic.co.uk.

We may have to disclose your information by law or because a court or the police or other law enforcement agency has asked us for it.

## How is your information protected?

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal

information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. Please also see the section above on 'Your Responsibilities'.

If you want detailed information on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

## Cookies

To obtain further information relating to the Cookies operating on our website, please view our Cookies Policy.

## Other websites

This site contains links to other sites such as accreditation companies and/or official regulating bodies. The Company is not responsible for the privacy practices or the content of such websites.

# Your Information Rights

The UK GDPR, gives you a number of important Information Rights which in most cases you can exercise free of charge. However, your ability to exercise your Information Rights depends on various factors, and in some cases it will not be possible for us to agree to your request e.g. where legal exemptions apply, or where the specific right you seek does not apply to the type of information we hold.

In summary, your Information rights are:

- The right to obtain confirmation from us as to whether or not we are processing your personal data and if we are, the right to be provided with certain supplementary information about our processing activities; however, please note that this Privacy Policy is already designed to provide you with that supplementary information;
- The right to ask us to correct any mistakes contained in the information we hold about you;
- The right to require us to erase your personal data in certain situations;
- The right to data portability, which means the right to receive (or for a third party you have chosen to receive) an electronic copy of the personal data you have given to us;
- The absolute right to object at any time to processing your personal data where we only use it for direct marketing;
- The right to object to decisions being taken about you based solely on automated means which produce legal effects concerning you or are similarly significant in how they affect you;
- The right to object in certain other situations to our continued processing of your personal information;

• The right to otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of these Information Rights, including the circumstances in which they apply, please see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation, the link is here <u>https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/</u>

If you would like to exercise any of the rights above, please email us at dataprotection@altecnic.co.uk or write to us at Data Protection, Altecnic Ltd, Mustang Drive, Stafford, ST16 1GW. Let us have enough information to identify you and let us know the information to which your request relates.

We want to make sure that your personal information is accurate and up to date. Therefore, if you think any information we hold about you is incorrect or incomplete, please email or write to us at the addresses given above as soon as possible so we can update our records.

## Changes to this privacy policy

We keep our Privacy Policy under regular review and if we change our Privacy Policy we will post those changes on this page so that you are always aware of what information we collect and how we use it. You should therefore refer to this policy regularly.

This policy was last updated in March 2023.